### I. CLAIM REJECTIONS

## A. <u>35 U.S.C. § 103(a) Rejections</u>

# 1. <u>Introduction</u>

Claims 1-7, 13, and 22-25 were rejected under 35 U.S.C. § 103(a) as unpatentable over Peterson in view of Thomas. Claims 8-12 and 14-21 were rejected under 35 U.S.C. § 103(a) as unpatentable over Peterson in view of Thomas and in further view of Murch. Claims 26-89 were rejected under the same rationale as Claims 1-25.

Applicants respectfully submit that the rejected claims of the present application are not obvious over the cited and applied references because Peterson in combination with Thomas fails to teach or suggest maintaining and storing a set of available inventory items defined by inventory information according to a three level hierarchy. The three level hierarchy of inventory information includes at least one group record defining a first level of detail for inventory information, a set of item category records defining a second level of detail that is associated to a referenced group record and corresponds to types of inventory items for the referenced group, and inventory records defining a third level of detail corresponding to instances of inventory item types referenced by the set of item category records. Prior to discussing more detailed reasons why applicants believe that all the claims of the present invention are allowable, a brief description of the present invention and the primary cited reference are presented.

# a. <u>Summary of the Present Invention</u>

The present invention is related to a method and system for processing available inventory item queries and inventory action requests corresponding to inventory information stored by three levels of detail. Each level within the hierarchy includes data corresponding to various aspects of an inventory item managed by a travel server.

LAW OFFICES OF CHRISTENSEN O'CONNOR JOHNSON KINDNESSPILE 1420 Fifth Avenue Suite 2800 Scattle, Washington 98101 206.682.8100 The first level of detail utilized to describe an inventory item defined by inventory information is a group record, the group record describing the broadest characteristic data associated with an inventory item. In one embodiment described by the application, group record information may include date-based information for a hotel such as general service fees, limitations of use, and the like. The second level of detail describing an inventory item is a record. Each record is associated with a group record and defines more specific data related to an inventory item. Each record may correspond to an item category such as types of rooms within a hotel i.e. double rooms, king size rooms, and penthouse suites. The inventory information includes an inventory record defining a third level of detail corresponding to the above referenced record. The third level of detail includes information corresponding to an instance of the record identified in the second level of detail. Each inventory record would include data describing specific characteristics of the inventory item, namely a hotel room(s) for sale. The information can include the cost of the room from the supplier, the price of the room charged to the consumer, and limitations of use.

Thus, the present invention provides the ability to store and manage inventory item queries and inventory action requests for a variety of inventory items according to a three level hierarchy.

#### b. U.S. Publication No. 2002/0082956, to Peterson et al.

Peterson is purportedly directed toward a process for integrating a maintenance supply network with an information network for selectively distributing information about inventory. See Peterson, paragraph 0004. Peterson teaches that inventory information can include an item number, the quantity of an item, and possibly the price of an item. Paragraphs 0190-0197. Thus, Peterson teaches that inventory can be associated with various attributes, such as an item number, quantity, and price.

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Peterson fails to teach or suggest managing and storing inventory information according to a three level hierarchy, the three level hierarchy of inventory information including at least one group record defining a first level of detail for the inventory item, a record corresponding to the group record and defining a second level of detail for the inventory item, and an inventory record corresponding to the record and defining a third level of detail for the inventory items.

## c. <u>U.S. Publication. No. 2004/0254835</u>, to Thomas et al.

Thomas is purportedly directed toward a process for obtaining information about a user's income, income sources, user's debts, and user's goals and prioritizing payment of bills corresponding to a savings goal, minimum amounts due, due dates, and available income. Thomas, abstract. The process includes gathering data which associates particular consumer purchasing behaviors and specific products or product criteria across a manufacturer's distribution channel. Paragraph 0013. Thomas teaches a database which stores information relating to the retailer's product inventory. Similar to Peterson, Thomas teaches that inventory (stocked item) can be associated with various attributes, such as a UPC and/or SKU number, and various type of identification information.

Nevertheless, Thomas fails to teach or suggest managing and storing inventory information according to a three level hierarchy, the three level hierarchy of inventory information including at least one group record defining a first level of detail for the inventory item, a record corresponding to the group record and defining a second level of detail for the inventory item, and an inventory record corresponding to the record and defining a third level of detail for the inventory items..

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# 2. <u>The Claims Distinguished</u>

record data for the matching inventory item.

### a. <u>Independent Claim 1</u>

Claim 1 reads as follows:

1. A method implemented in a computer device for processing an available inventory item query corresponding to inventory items defined by inventory information, the method comprising:

storing a set of available inventory information according to a three level hierarchy, wherein the three level hierarchy includes:

at least one group record defining a first level of detail for inventory information;

a set of item category records defining a second level of detail that is associated to a referenced group record and corresponds to types of inventory items for the referenced group;

inventory records defining a third level of detail corresponding to instances of inventory item types referenced by the set of item category records;

obtaining, by the computer device, an available inventory query, the query including a set of criteria;

determining at least one inventory item matching the query criteria; and transmitting matching group record, item category record, and inventory

Applicants agree that "Peterson et al fails to teach a method wherein the at least one record includes information corresponding to a type of inventory item and wherein the at least one inventory record includes information corresponding to an instance of the type of inventory item identified in the record" as previously recited in the claims. Office Action, page 3. For the same reasons, it would further fail to teach or suggest managing and storing inventory information according to a three level hierarchy, wherein the three level hierarchy of inventory information includes at least one group record defining a first level of detail for the inventory item, a set of item category records defining a second level of detail that is associated to a referenced group record and corresponds to types of inventory items for the referenced group,

I.AW OFFICES OF CHRISTENSEN O'CONNOR JOHNSON KINDNESSPLE 1420 Fifth Avenue Suite 2800 Seattle, Washington 98101 206.682.8100 and inventory records defining a third level of detail corresponding to instances of inventory item types referenced by the set of item category records as recited in the amended claim.

Applicants respectfully submit that Thomas also fails to teach or suggest managing and storing inventory information in three distinct levels of detail. Thomas teaches that the inventory can be associated with various attributes. Thomas teaches a database which stores information relating to the retailer's product inventory. The information includes "stocked merchandise, a UPC and/or SKU number for each item of merchandise, and various types of merchandise identification information, such as price, inventory, style, color, size, etc., which is associated with each UPC and/or SKU number." Thomas, paragraph 0011. Thus, Thomas corresponds to a traditional database approach in which inventory information is stored and managed in a two tier format, i.e., a plurality of records are contained within a database of specific instance data for each inventory item (e.g., price, color, size) with higher group information (such as style, type). Thomas does not contemplate the implementation for storing inventory information in a three tier level of data. Therefore, Peterson and Thomas, either alone or in combination, fail to teach or suggest the present invention.

Generally described, under 35 U.S.C. § 103(a), a *prima facie* case of obviousness can be established only if the cited references, alone or in combination, teach each and every element recited in the claim. *In re Bell*, 991 F.2d 781 (Fed. Cir. 1993). Peterson and Thomas, alone or in combination, fail to teach or suggest storing and managing a set of available inventory information according to a three level hierarchy. The three level hierarchy of inventory information includes at least one group record defining a first level of detail for the inventory item, a set of item category records defining a second level of detail that is associated to a referenced group record and corresponds to types of inventory items for the referenced group, and inventory records defining a third level of detail corresponding to instances of inventory item

LAW OFFICES OF CHRISTENSEN O'CONNOR JOHNSON KINDNESSPELC 1420 Fifth Avenue Suite 2800 Seattle, Washington 98101 206 682 8100 types referenced by the set of item category records. For the above reasons, applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of Claim 1 and assert that Claim 1 is patentable under 35 U.S.C. § 103(a) over Peterson and Thomas.

## c. Dependent Claims 2-22, 24, and 25

Claims Claims 2-22, 24, and 25 are dependent on Claim 1. As discussed above, Peterson and Thomas, alone or in combination, fail to teach or suggest all of the limitations recited with regard to Claim 1. Accordingly, for the above-mentioned reasons, Claims 2-22, 24, and 25 are allowable over the cited art. In addition, Claims 2-22, 24, and 25 further add to the patentability and nonobviousness of the present invention. For these reasons, applicants respectfully request withdrawal of the § 103(a) rejections with regard to Claims 2-22, 24, and 25 and allowance of the claims.

## d. <u>Claims 26-39, 41-64, 66-80, and 82-88</u>

Claims 26-39, 41-64, 66-80, and 82-88 carry the same limitations as Claims 1-22, 24, and 25. More specifically, Claims 26-39, 41-64, 66-80, and 82-88 carry the limitation of storing and managing a set of available inventory information according to a three level hierarchy. The three level hierarchy of inventory information includes at least one group record defining a first level of detail for the inventory item, a set of item category records defining a second level of detail that is associated to a referenced group record and corresponds to types of inventory items for the referenced group, and inventory records defining a third level of detail corresponding to instances of inventory item types referenced by the set of item category records. As discussed above, Peterson and Thomas fail to teach or suggest all of the limitations recited with regard to Claim 1. Claims 2-22, 24, and 25 are dependent on allowable Claim 1. Thus, Peterson and Thomas further fail to teach or suggest all of the limitations recited with regard to Claims 2-22, 24, and 25. Because Peterson and Thomas fail to teach or suggest all of the limitations recited

LAW OFFICES OF CHRISTENSEN O'CONNOR JOHNSON KINDNESS\*\*\* 1420 Fifth Avenue Suite 2800 Seattle, Washington 98101 206 682.8100 with regard to Claims 2-22, 24, and 25, Peterson and Thomas likewise fail to teach or suggest all of the limitations recited with regard to Claims 26-39, 41-64, 66-80, and 82-88. Accordingly, for the above-mentioned reasons, Claims 26-39, 41-64, 66-80, and 82-88 are allowable over Peterson and Thomas.

With regard to Claims 26-39, 41-64, 66-80, and 82-88, applicants respectfully submit that Peterson and Thomas fail to teach or suggest each and every element recited in the respective claims. For these reasons, applicants respectfully request a withdrawal of the § 103(a) rejection with regard to Claims 26-39, 41-64, 66-80, and 82-88 and allowance of the claims.

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## CONCLUSION

Based on the above-referenced arguments and amendments, applicants respectfully submit that all of the pending claims of the present application, Claims 1-22, 24-39, 41-64, 66-80, and 82-88, are allowable over Peterson and Thomas. Because the cited references fail to teach or suggest storing and managing a set of available inventory information according to a three level hierarchy, applicants respectfully request withdrawal of the rejections of the claims and allowance of the present application.

If any questions remain, applicants request that the Examiner contact the undersigned at the telephone number listed below.

Respectfully submitted,

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